

CHAITMAN LLP

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Attorneys for Participating Claimants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**JOINDER TO REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF
MOTION IN LIMINE TO EXCLUDE HEARSAY STATEMENTS REGARDING
PROFIT WITHDRAWALS, AND TO LIMIT THE PROPOSED TESTIMONY OF LISA
M. COLLURA AND MATTHEW B. GREENBLATT**

Participating Claimants represented by Chaitman LLP (“Participating Claimants”) [*see* ECF No. 14364-1], join the reply memorandum of law in further support of motion *in limine* of Doctors Joel and Norman Blum, filed on December 9, 2016, through their attorneys, Baker & McKenzie, LLP to exclude hearsay statements regarding profit withdrawals and to limit the proposed testimony of Lisa M. Collura and Matthew B. Greenblatt (the “Blum Reply

Memorandum”). [ECF No. 14592].

BASIS FOR JOINDER

1. The Trustee offers hearsay statements and expert reports that do not comply with the Federal Rules of Evidence to deny Participating Claimants’ SIPC claims.

2. To avoid duplicative briefing, Participating Claimants join the Blum Reply Memorandum.

CONCLUSION

The Participating Claimants respectfully request that the Court grant the Motion of Doctors Joel and Norman Blum, filed on October 28, 2016, through their attorneys, Baker & McKenzie, LLP to exclude hearsay statements regarding profit withdrawals and to limit the proposed testimony of Lisa M. Collura and Matthew B. Greenblatt. [ECF No. 14361].

Dated: New York, New York
December 9, 2016

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2016, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

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LLC and the Estate of Bernard L. Madoff*

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